

MODERN SLAVERY STATEMENT

This statement is pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 30 December 2020.

Collins Aerospace group is committed to ensuring slavery and human trafficking are not taking place in our business or supply chains. This statement sets out the actions taken by Collins Aerospace group, through all its operating companies in the United Kingdom (as listed below), during the financial year ending 31 December 2020 to ensure slavery and human trafficking is not taking place in any part of our operations or supply chain.

Our Corporate Structure

Collins Aerospace is part of Raytheon Technologies Corporation (“RTX”). RTX is a corporation incorporated under the laws of the State of Delaware, USA and listed on the New York Stock Exchange. RTX is an aerospace and defense company that provides advanced systems and services for commercial, military, and government customers worldwide. The company was formed in 2020 through the combination of Raytheon Company and the United Technologies Corporation aerospace businesses. RTX is headquartered in Waltham, Massachusetts, U.S.A. and a global manufacturer with a highly skilled workforce comprised of approximately 195,000 employees. RTX consists of four highly specialized businesses: Collins Aerospace Systems, Pratt & Whitney, Raytheon Intelligence & Space, and Raytheon Missiles & Defense; with each segment comprised of groups of similar operations.

- Collins Aerospace specializes in aerostructures, avionics, interiors, mechanical systems, mission systems, and power and control systems that serve customers across the commercial, regional, business aviation and military sectors.
- Pratt & Whitney designs, manufactures and services the world’s most advanced aircraft engines and auxiliary power systems for commercial, military and business aircraft.
- Raytheon Intelligence & Space (RIS) delivers disruptive technologies its customers need to succeed in any domain, against any challenge. RIS specializes in developing advanced sensors, training, and cyber and software solutions that provide a decisive advantage to civil, military and commercial customers around the world.
- Raytheon Missiles & Defense (RMD) produces a broad portfolio of advanced technologies, including air missile defense systems, precision weapons, radars, and command and control systems – delivering end-to-end solutions to detect, track and engage threats.

Our Operations

Collins Aerospace is a leading global provider of technologically advanced aerospace and defense products and aftermarket service solutions for aircraft manufacturers, airlines, and regional, business and general aviation, as well as for defense and commercial space operations.



Our Supply Chain

Collins Aerospace seeks to develop strategic relationships with reputable, responsible suppliers that are committed to the highest standards of ethics and business conduct. We rely on a global supply chain to deliver goods and services, in a timely and satisfactory manner, and in full compliance with applicable terms and conditions.

Our global supply chain spans many industries. Our suppliers can be divided into two broad categories:

- Product suppliers (a/k/a “direct” suppliers) – i.e., those that support the delivery of services and products to our customers; and
- Non-product suppliers (a/k/a “indirect” suppliers) – i.e., those that support our operations.

The products we procure for the delivery of our programs are predominantly high-end technology or commercial off-the-shelf products. We procure from large multinational companies and from small and medium-sized businesses.

Our Exposure to Modern Slavery

We consider our exposure to modern slavery to be low due to the nature of our business, the marketplaces that we and our suppliers operate in, and our company’s policies and procedures for combatting modern slavery (these are described in more detail in the below section titled, “Our Policies and Procedures Combatting Modern Slavery”).

Risk in Our Operations

We do not have a significant risk of modern slavery within our operations or workforce. Modern slavery is anathema to our culture and values. Our internal policies and procedures are designed to provide a safe work environment, ensure compliance with applicable law, and respect and protect human rights by, among other things, condemning and prohibiting the use of forced labor. As an aerospace and defense company, we operate in a highly regulated industry, predominantly employ a highly skilled workforce, and do not operate in any sector or industry that has a prevalence to modern slavery risks.

Risk in Our Supply Chain

Because of the nature of the goods and services we predominantly source, where our suppliers are predominantly located, the risk-based due diligence we conduct to ensure potential suppliers are qualified and reputable before on-boarding, and our standard terms and conditions of purchase requiring suppliers to comply with applicable laws, we do not have a significant risk of modern slavery within our supply chain. However, we recognize that forced labour and related practices have the potential to intersect with our supply chain, and as described below in more detail, we have established policies and procedures to mitigate that risk.



Managing Modern Slavery Risks

Collins Aerospace is committed to responsible and ethical business practices and expects our business partners and suppliers to share that commitment. Every employee is responsible for ensuring that our business is conducted in compliance with applicable laws (including laws prohibiting forced labor) and with our Code of Conduct. The RTX Code of Conduct describes our values and standards; and how we work with our people, our customers and partners, local communities, and the public.

RTX Code of Conduct

Stronger Together, Raytheon Technologies' global Code of Conduct (the "Code") is the foundation of our culture. By setting standards and by guiding us in line with our values, the Code helps us to build a strong ethical culture and to achieve our business goals with integrity. It applies to all our directors, officers, and employees, and in certain respects, to business partners such as suppliers, consultants, representatives, and agents. Among other things, the Code includes the following statements regarding selecting and collaborating with the right partners and the protection of human rights:

We choose our business partners based on merit and shared values and treat them fairly. We seek business partners who can help us achieve our goals by working collaboratively to provide expertise, resources, efficiency, and innovation. This helps us deliver excellent, reliable products on time and on budget. We expect partners to share our high ethical and safety standards and our passion for making a positive impact in the world. Selecting and collaborating with the right partners means that we:

- *Seek to do business with partners who meet our needs and share our values;*
- *Conduct risk-based due diligence to ensure potential partners are qualified and reputable before on-boarding;*
- *Monitor business partner performance on an ongoing basis;*
- *Expect our partners to uphold our values and comply with anti-bribery conventions and all other applicable laws; and*
- *Formalize relationships in writing to provide transparency and accountability.*

Respecting and protecting human rights mean that we:

- *Ensure safe and healthy working conditions for our employees, by applying best practices in our day-to-day activities and facilities and ensuring compliance with the most stringent applicable EHS standard;*
- *Promote responsible sourcing practices and hold business partners accountable to the standards we set in our Supplier Terms and Conditions and Code of Conduct;*
- *Work only with business partners who share our commitment to fighting human trafficking and supporting human rights;*
- *Condemn and prohibit the use of child or forced labor; and*
- *Follow company policies, regulations, and guidance regarding potential conflict minerals.*

The Code is available [here](#).



Internal Accountability Standards – Reporting Encouraged, without Fear of Retaliation

Collins Aerospace is committed to a culture where people are encouraged and confident to speak up, without fear of retaliation. This is an enterprise-wide value.

RTX promotes behaviors based on trust, respect, and accountability. When employees, contractors and partners observe or suspect something that conflicts with our values, we encourage them to speak up and report it. Employees are encouraged and expected to report anything that is, or appears to be, a violation of the *Code* of which they are aware and that have not otherwise been reported to management or to the Global Ethics & Compliance organization. Additional information regarding the various resources available to ask a question or raise concerns, including in complete confidence through the Ombudsman Program, is available [here](#).

All concerns or allegations of misconduct submitted to the RTX Ethics Office will be thoroughly investigated in the ordinary course by the company's Ethics Office and, if substantiated, resolved through appropriate corrective action.

RTX has zero tolerance for retaliation and activities that impact good-faith reporting – anyone engaging in retaliatory behavior is subject to disciplinary action, up to possible termination.

Internal Training

RTX recognizes that our people play an important role in building and maintaining a strong ethical culture where we achieve our business goals with integrity, in accordance with our *Code*, and applicable laws. All employees receive annual ethics and compliance training. We also make training available to all employees on recognizing and mitigating the risk of human trafficking and modern slavery in supply chains.

Supply Chain Expectations and Assessment Processes

Collins Aerospace's suppliers are critical to our success and our ability to provide superior products and services in a responsible manner. As a vital part of our team, we have the same expectations of our suppliers for ethics and compliance as we have for our officers, directors, employees, and representatives.

- **Compliance with all Applicable Laws:** Our standard terms and conditions of purchase require suppliers to comply with all applicable laws and regulations.
- **RTX Supplier Code of Conduct (*Supplier Code*):** Among other things, the *Supplier Code* requires suppliers to ensure child labor is not used in the performance of their work, whether or not related to RTX business. It also requires suppliers to fully comply with laws and regulations prohibiting human trafficking. This includes prohibiting the use of forced, bonded or indentured labor, involuntary prison labor, slavery, or trafficking in persons. The *Supplier Code* provides that our suppliers will allow RTX and/or its representatives to assess their compliance, as well as the compliance of the supplier's business partners,



with the expectations set forth in the *Supplier Code* in performing work for RTX, including on-site inspection of facilities. The *Supplier Code* is available [here](#).

- **Supplier Assessment and Verification (including Audits):** Suppliers are subject to robust selection processes and criteria, including for example, verification against government denied party lists. Periodically, in the normal course of business, we may conduct a site visit with a supplier. However, in the ordinary course of business, we do not conduct site visits or otherwise evaluate or audit suppliers specifically for the purpose of verifying the eradication of slavery and human trafficking in their supply chains. Anyone who suspects or observes such conduct may ask a question or raise concerns, including in complete confidence, through the above described resources.
- **Supplier Certification:** In the normal course of business, we do not require suppliers to expressly certify that materials incorporated into goods furnished to us comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Sub-tier suppliers that directly support U.S. Government prime contracts must include Federal Acquisition Regulation (“FAR”) clause 52.222-50, Combating Trafficking in Persons, where applicable. This clause contains a reporting obligation to notify the Contracting Officer and the agency Inspector General immediately of any credible information we receive from any source that alleges an employee or subcontractor has engaged in conduct that violates the policy. Suppliers must submit certifications where required by the FAR.

Effectiveness of Actions Taken

Questions or concerns raised through the above-described reporting mechanisms would be directed to Global Ethics & Compliance for a thorough investigation. No such reports or concerns were made during the Reporting Period and we have not otherwise identified any instances of modern slavery or human trafficking in our business or in our supply chain. This is consistent with our assessment that overall, our exposure to human trafficking and modern slavery is low.

Continuous Improvement Efforts to Mitigate Risk

Since December 31, 2020, Collins Aerospace has taken, or intends to take the following steps to continue to ensure modern slavery is not taking place in its organization or supply chain. As part of our regular business operations, we intend to:

- Raise internal and external awareness regarding our corporate policy condemning and prohibiting the use of child and forced labor;
- Seek to do business with reputable, responsible suppliers that are committed to the highest standards of ethics and business conduct;
- Require our suppliers, through our standard terms and conditions of purchase, to represent that they will (1) comply with all applicable laws and regulations (including those that prohibit forced labor and modern slavery) and (2) comply with a code of conduct or policy



statement regarding business conduct, ethics and compliance that satisfies, at a minimum, the principles set forth in the RTX Supplier Code of Conduct;

- Provide employees with additional training resources designed to increase awareness of ethics and compliance matters generally, as well as on recognizing and mitigating the risks of human trafficking and modern slavery in supply chains;
- Through our Ethics Office, thoroughly investigate any concerns or allegations of misconduct submitted to the RTX or Collins Aerospace's Ethics Office and, if substantiated, resolve through appropriate corrective action; and
- Monitor the development of new regulations relating to prevention of modern slavery and human trafficking, to ensure that our policies and procedures remain current and compliant.

Statement Approval

This statement has been approved by our Executive Leadership Team on 3 May 2021.

Signed by: **Christoph T. Feddersen – Vice President & General Counsel**

Collins Aerospace

May 2021



Collins Aerospace United Kingdom Operating Companies

Atlantic Inertial Systems Limited
B/E Aerospace (UK) Limited
BE Aerospace (UK) Europe Holdings Limited
BE Aerospace Global Holdings Limited
BE Aerospace Holdings (UK) Limited
BE Aerospace International Holdings Limited
BE Aerospace Thermal and Power Management Holdings (UK) Limited
Claverham Group Limited
Claverham Limited
Crompton Holdings Limited
Crompton Technology Group Limited
CT Group Limited
Delavan Limited
Goodrich (Great Britain) Limited
Goodrich Actuation Systems Limited
Goodrich Aerospace UK Limited
Goodrich Control Systems
Goodrich Controls Holding Limited
Goodrich Holding UK Limited
Goodrich Inertial Holdings Limited
Goodrich Limited
Goodrich Systems Limited
Hamilton Sundstrand UK Holdings Limited
HS Marston Aerospace Limited
Kidde Graviner Limited
Microtecnica Actuation Technologies Limited
Page Aerospace Limited
Page Engineering (Holdings) Limited
Pulse.Aero Limited
Quest Flight Training Limited
Rockwell Collins UK Limited
Rohr Aero Services Limited
Rosemount Aerospace Limited
Rosemount Aerospace Properties Limited
Silicon Sensing Products (UK) Limited
Silicon Sensing Systems Limited
Simmonds Precision Limited
Sonic.Aero Limited
SWAP (One) Limited
SWAP, United Kingdom
WASP Membranes Limited
Wessex Advanced Switching Products Limited